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Counsel to the Debtors and Debtors in
Possession

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

- - - - - x
In re: : Chapter 11
:
CIRCUIT CITY STORES, INC., : Case No. 08-35653 (KRH)
et al., :
:
Debtors. : Jointly Administered
- - - - - x

**CONSENT MOTION OF THE DEBTORS FOR ENTRY OF ORDER
RESOLVING THE UNITED STATES CUSTOMS AND BORDER
PROTECTION'S OBJECTION TO CONFIRMATION**

With the consent of United States Customs and Border
Protection, the debtors and debtors in possession in the above-
captioned jointly administered cases (the "Debtors")¹ hereby move

¹ The Debtors and the last four digits of their respective taxpayer
identification numbers are as follows: Circuit City Stores, Inc. (3875),
Circuit City Stores West Coast, Inc. (0785), InterTAN, Inc. (0875), Ventoux
International, Inc. (1838), Circuit City Purchasing Company, LLC (5170), CC
Aviation, LLC (0841), CC Distribution Company of Virginia, Inc. (2821),
(cont'd)

(the "Motion"), for entry of the Order by and among the Debtors and United States Customs and Border Protection, attached hereto as Exhibit A (the "Consent Order"). The Consent Order resolves the United States Customs and Border Protection's Objection to Confirmation of Chapter 11 Plan (D.I. 5661) (the "Objection").

(cont'd from previous page)

Circuit City Properties, LLC (3353), Kinzer Technology, LLC (2157), Abbott Advertising Agency, Inc. (4659), Patapsco Designs, Inc.(6796), Sky Venture Corp. (0311), Prahs, Inc.(n/a), XSStuff, LLC (9263), Mayland MN, LLC (6116), Courcheval, LLC (n/a), Orbyx Electronics, LLC (3360), and Circuit City Stores PR, LLC (5512). The address for Circuit City Stores West Coast, Inc. is 9250 Sheridan Boulevard, Westminster, Colorado 80031. For all other Debtors, the address was 9950 Mayland Drive, Richmond, Virginia 23233 and currently is 4951 Lake Brook Drive, Glen Allen, VA 23060.

WHEREFORE, the Debtors respectfully request that the Court enter the Consent Order.

Dated: September 3, 2010 SKADDEN, ARPS, SLATE, MEAGHER &
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EXHIBIT A
(Consent Order)

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 Debtors in Possession

IN THE UNITED STATES BANKRUPTCY COURT
 FOR THE EASTERN DISTRICT OF VIRGINIA
 RICHMOND DIVISION

- - - - - x
 In re: : Chapter 11
 :
 CIRCUIT CITY STORES, INC., et : Case No. 08-35653 (KRH)
al., :
 :
 Debtors. : Jointly Administered
 - - - - - x

**CONSENT ORDER RESOLVING UNITED STATES CUSTOMS AND BORDER
 PROTECTION'S OBJECTION TO CONFIRMATION**

Upon consideration of the Consent Motion of the
 Debtors for Entry of Order Resolving Objection to Confirmation
 (the "Motion");¹ and the parties having consented to the relief
 requested in the Motion on the terms and conditions set forth

in this Order (the "Consent Order"); and, this Court having reviewed the First Amended Joint Plan of Liquidation of Circuit City Stores, Inc. and its Affiliated Debtors and Debtors In Possession and its Official Committee of Creditors Holding General Unsecured Claims (D.I. 5124), and the Disclosure Statement with Respect to Joint Plan of Liquidation of Circuit City Stores, Inc. and Its Affiliated Debtors and Debtors in Possession and Its Official Committee of Creditors Holding General Unsecured Claims (D.I. 5103), as well as the Second Amended Joint Plan of Liquidation of Circuit City Stores, Inc. and Its Affiliated Debtors and Debtors in Possession and Its Official Committee of Creditors Holding General Unsecured Claims (D.I. 8252)(the "Plan"), and the Supplemental Disclosure with Respect to Second Amended Joint Plan of Liquidation of Circuit City Stores, Inc. and Its Affiliated Debtors and Debtors in Possession and Its Official Committee of Creditors Holding General Unsecured Claims and Notice of Deadline to Object to Confirmation (D.I. 8253), and after due deliberation thereon; and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

¹ Each capitalized term not otherwise defined herein shall have the meaning ascribed to it in the Motion.

1. The Objection is resolved as set forth in this Consent Order.

2. To the extent required, the automatic stay of 11 U.S.C. § 362 is lifted for the limited purpose of permitting CBP to assess the sum of \$38,648.92 against the Debtors for the coaxial duties.

3. To the extent required, the automatic stay of 11 U.S.C. § 362 is lifted for the limited purpose of permitting CBP to offset the pre-petition refund, in the sum of \$10,186.93, against the coaxial duties.

4. CBP shall be deemed a "taxing authority" within the meaning of the Plan, Article.VI.H.2, and will retain all rights (including rights of setoff) against any non-debtor third parties, including Safeco Insurance Company of America, as surety under the Importer Broker Bond issued in favor of CBP.

5. Nothing herein shall preclude or limit the Debtors' rights to contest the validity and amount of the coaxial duties and the pre-petition refund.

6. Upon entry by the Bankruptcy Court, this Consent Order shall be binding upon and shall inure to the benefit of CBP and the Debtors and each of their respective successors and assigns.

7. This Consent Order contains the entire agreement and understanding between CBP and the Debtors with respect to the subject matter hereof, and supersedes and replaces all prior negotiations or proposed agreements, written or oral.

8. The Bankruptcy Court shall retain exclusive jurisdiction to hear and determine all matters relating to or arising from this Consent Order.

DATED: _____, 2010

Honorable Kevin R. Huennekens
United States Bankruptcy Judge

ENTERED ON DOCKET:

WE ASK FOR THIS:

United States Customs and Border
Protection

CIRCUIT CITY STORES, INC.

By:

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Counsel for Circuit City
Stores, Inc.,
et al., Debtors and Debtors
in Possession

CERTIFICATION OF ENDORSEMENT UNDER LOCAL RULE 9022-1(C)

Pursuant to Local Bankruptcy Rule 9022-1(C), I hereby certify that the foregoing proposed order has been endorsed by or served upon all necessary parties.

/s/ Douglas M. Foley
Douglas M. Foley